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Attorneys for Defendant
ANDREW JACE LARRABURE-TUMA

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW JACE LARRABURE-TUMA,

Defendant.

CASE NO. 2:21-CR-00213-DAD

STIPULATION TO CONTINUE SENTENCING
DATE; ORDER

DATE: January 10, 2023
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Defendant Andrew Jace Larrabure-Tuma, by and through his counsel of record, and plaintiff
United States of America, by and through its counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on January 10, 2023.
2. By this stipulation, defendant now moves to continue the sentencing until February 21, 2023, at 9:30 a.m. As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for defendant is waiting to receive records related to sentencing mitigation. These records were originally requested prior to the defendant's change of plea hearing.
 - b) The records could be imperative to defense counsel's argument at sentencing.
 - c) Counsel for defendant believes that failure to grant the above-requested

1 continuance would deny her the reasonable time necessary for effective preparation, taking into
2 account the exercise of due diligence.

3 d) The government does not object to the continuance.

4 IT IS SO STIPULATED.

5 Respectfully submitted,

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7 HEATHER E. WILLIAMS
Federal Defender

8 Dated: November 30, 2022

9 /s/ Meghan D. McLoughlin
MEGHAN D. McLOUGHLIN
Counsel for Defendant
10 ANDREW JACE LARRABURE-TUMA

11 Dated: November 30, 2022

12 /s/ Justin L. Lee
JUSTIN L. LEE
Assistant United States Attorney

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15 **FINDINGS AND ORDER**

16 IT IS SO ORDERED.

17 Dated: **November 30, 2022**

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UNITED STATES DISTRICT JUDGE